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*Proposed Counsel to the Official
Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,)	Case No. 22-10943 (MEW)
Debtors. ¹)	(Jointly Administered)
)	
)	

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS**

PLEASE TAKE NOTICE that McDermott Will & Emery LLP hereby enters its appearance (this “Notice of Appearance”) in the above-captioned cases as proposed counsel to the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., et al. pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”), and rules 2002, 3017, 9007, and 9010 of the Federal

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Voyager Digital Holdings, Inc.’s and Voyager Digital Ltd.’s principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003. Voyager Digital, LLC’s principal place of business is 701 S. Miami Ave, 8th Floor, Miami, FL 33131.

Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). McDermott Will & Emery LLP hereby requests that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code section 1109(b) and Bankruptcy Rule 3017(a), this request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, motion, proposed order, application, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile, electronically, or otherwise, that is filed or given in connection with the above-captioned cases.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any prior or later appearance, pleading, or claim waives (i) any right to have final orders in non-core matters arising in or related to the above-captioned chapter 11 cases entered only after *de novo* review by a district court judge; (ii) any right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (iii) any right to have a district court judge withdraw the reference in any matter subject to

mandatory or discretionary withdrawal; (iv) an election of remedies; or (v) any other substantive or procedural right.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance is without prejudice to any other rights, claims, actions, defences, setoffs, or recoupments under agreement, in law, in equity, or otherwise, all of which rights, claims, actions, defences, setoffs, and recoupments against a debtor or any other entity either in these cases or in any other action are expressly reserved.

Dated: New York, New York
August 2, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of August 2022, a true and correct copy of the foregoing *Notice of Appearance and Request for Service of All Notices and Documents* has been served (i) via electronic notification pursuant to the CM/ECF system for the United States Bankruptcy Court for the Southern District of New York or (ii) via-email, as indicated in the attached Service List.

/s/ Darren Azman

Darren Azman

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